



March 7, 2014

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 10-90, Connect America Phase II Experiments:
Expression of Interest from Pacific Lightwave, a California corporation**

Dear Ms. Dortch:

In accordance with the timelines and guidance in the Federal Communications Commission's ("FCC") Order, Report and Order and Further Notice of Proposed Rulemaking issued on January 30, 2014 in WC Docket No. 10-90 and GN Docket No. 13-5 (the "CAF Experiments Order"), Pacific Lightwave, a California corporation ("Pacific Lightwave") hereby expresses interest in a broadband "experiment" covering several of the unserved, rural areas identified as potential targets for broadband deployment projects. Specifically, Pacific Lightwave is interested in a potential project to serve rural areas of Imperial County, California, along the south, southeast, and southwest shores of the Salton Sea, near the City of Calipatria. Pacific Lightwave is also interested in serving unserved rural areas west of the Salton Sea near the Borrego Springs unincorporated area of San Diego County. This expression of interest is subject to the availability of further information regarding the conditions associated with the FCC's broadband experiments, and Pacific Lightwave's commitment to the project depends upon its ability to obtain any necessary state certifications (including Eligible Telecommunications Carrier ("ETC") status) and upon the extent to which the terms of any grant proposals are satisfactory to Pacific Lightwave. Pacific Lightwave believes that a project in this area would confer significant benefits to these rural, desert communities and the residential and business customers who reside there. Pacific Lightwave looks forward to reviewing any additional information regarding the requirements of participation in broadband experiments, and to developing further specifics regarding its proposed project.

Company Background

Pacific Lightwave is a certificated Competitive Local Exchange Carrier ("CLEC") and internet access provider, serving primarily the Palm Springs and Coachella Valley area. Pacific Lightwave serves residential and business customers, and also provides service to anchor institutions, such as hospitals, health care clinics, and various community-based organizations in Coachella Valley. Pacific Lightwave has been providing service since 2008, and received its



Certificate of Public Convenience and Necessity ("CPCN") from the California Public Utilities Commission ("CPUC") in 2010. The company is not currently a competitive ETC, but would be prepared to obtain such authority in order to pursue the identified broadband experiment project. Further information regarding Pacific Lightwave can be obtained at the company's website at the following address: <http://paclw.com/>

The Proposed Project Area

The proposed project areas would be just to the south and southeast of Pacific Lightwave's primary service area, so Pacific Lightwave is familiar with the terrain, the communities, and the service needs in the area. Pacific Lightwave has reviewed information supplied by the FCC regarding areas that would be appropriate for broadband experiments, and Pacific Lightwave understands that the following census tracts are within that group: 06025010101, 06025010102, 06025010200, 06025010300, 06025012301, 06025012302, 06073021000, and 06025012400. Pacific Lightwave understands that these areas are either part of AT&T's service territory or in "unfiled" territory. Based on the FCC's information, and Pacific Lightwave's own experience with this area, Pacific Lightwave understands that internet access is limited in this area, and in many cases, non-existent.

The southern end of the Salton Sea includes the communities of Calipatria, Westmorland, Brawley, and Niland. This rural area has a significant low-income population that is in need of additional infrastructure and broadband connectivity. The area has agricultural interests, three small airports, a hospital and at least two other medical centers, a child development services office, fire departments, more than a dozen schools, and a San Diego State University extension site. In the Borrego Springs area, there are also a number of anchor institutions.

Technology and Services to be Deployed

Pacific Lightwave is poised to meet the broadband needs in this insufficiently-served rural areas near the south end of the Salton Sea and areas west of the Salton Sea near Borrego Springs. Pacific Lightwave would be prepared to create a modern fiber-optic network in this area using state-of-the art facilities and electronics. The network would rely on microwave transport to the extent necessary to connect to "second mile" and "middle mile" facilities. Depending on the availability of funding, Pacific Lightwave believes that it could create a network that would deliver speeds ranging from 7/2 Mbps download/upload to 100/100 Mbps upload/download, or possibly even higher.

Local Support for Project

Pacific Lightwave only learned of the potential availability of funding for broadband experiments very recently, so there has not been sufficient time to gather local support for the project. However, Pacific Lightwave has developed strong relationships with anchor institutions, government, and community groups in the Coachella Valley area, and it is prepared to reach out to the appropriate community organizations and local officials in the target project area. Pacific Lightwave believes that the residents and community groups of these areas would be enthusiastic



about receiving high-speed internet access delivered over modern facilities. Pacific Lightwave would be prepared to work closely with local officials and other key stakeholders as the project moves forward.

Nature of Funding Requested

Pacific Lightwave believes that it could create the necessary facilities in this area through a one-time grant, provided that the grant is significant enough. Pacific Lightwave will continue to evaluate this and prepare specific cost estimates for this project as the FCC moves toward the formal grant process envisioned by the CAF Experiments Order. Pacific Lightwave may be able to be flexible in the nature, extent, and precise location of the project depending on the availability of funding and the specific requirements attached to acceptance of a CAF experiment grant.

* * *

Pacific Lightwave appreciates the FCC's interest in bringing advanced communications infrastructure to rural areas, and appreciates the opportunity to submit this letter of interest. Pacific Lightwave looks forward to reviewing additional information about the broadband experiments, and to preparing further details to support this proposed project at the appropriate time. Should you have any questions regarding this proposal, do not hesitate to contact me at Simon@paclw.com or at 760-834-0233.

Simon Bojkovsky
President, Pacific Lightwave